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# UNITED STATES DISTRICT COURT

NORTHERN DISTRICT OF ILLINOIS, EASTERN DIVISION

UNITED STATES OF AMERICA

V.

RICHARD E. DORONIUK,  
MAHMOUD SHAMAH, aka "Mike," and  
LARRY CROSS, aka "Peanut"

**UNDER SEAL**

CRIMINAL COMPLAINT

CASE NUMBER:

I, the undersigned complainant being duly sworn state the following is true and correct to the best of my knowledge and belief:

Beginning no later than in or about June 2006 and continuing until at least August 2006 in the Northern District of Illinois, defendants did conspire with each other and with others to steal money belonging to the United States, namely approximately \$31,100 in funds belonging to the Federal Bureau of Investigation, in violation of Title 18, United States Code, Section 641, all in violation of Title 18, United States Code, Sections 371 and 2.

I further state that I am an FBI Special Agent and that this complaint is based on the following facts:

See Attached Affidavit.

Continued on the attached sheet and made a part hereof:  X  Yes   No

\_\_\_\_\_  
Signature of Complainant

Sworn to before me and subscribed in my presence,

October 24, 2006 at Chicago, Illinois  
Date City and State

Hon. Nan R. Nolan U.S. Magistrate Judge  
Name & Title of Judicial Officer

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Signature of Judicial Officer